

**Federal Defenders
OF NEW YORK, INC.**

David E. Patton
*Executive Director
and Attorney-in-Chief*

VIA ECF & EMAIL

The Honorable Philip M. Halpern
United States District Judge
Southern District of New York
300 Quarropas Street,
White Plains, NY 10601

<p>Application granted.</p> <p>Mr. Smith's bail conditions are modified to allow for a curfew, as directed by Pretrial Services, so that Mr. Smith may work at his new job.</p> <p>The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 18.</p> <p>SO ORDERED.</p>  <p>Philip M. Halpern United States District Judge</p> <p>Dated: White Plains, New York September 23, 2022</p>	<p>Southern District 81 Main Street, Suite 300 50 109</p>
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Re: *United States v. Dominic Smith, 7:22-cr-412-PMH*

Dear Honorable Judge Halpern:

I write to respectfully request that the Court modify Mr. Smith's bail conditions to allow a curfew, directed by Pre-Trial Service, so that Mr. Smith may work at a recently acquired job.

Mr. Smith has recently been employed by a car company at LaGuardia Airport. Part of the function of this position is to pick up cars from around the airport and drive them to locations around New York City to be serviced. One of Mr. Smith's current release conditions requires an ankle monitor.

I inquired of Mr. Smith's Pre-trial Officer Andrew Abbot regarding the easiest way to modify his conditions to permit him to work in this new position. Officer Abbot suggested that a curfew directed by Pre-Trial Services would permit Mr. Smith to work at this position and allow Pre-Trial to supervise him. Therefore, Officer Abbott does not object to this request. I have contacted the Government, through Assistant United States Attorney Jeffrey Coffman, who also has no objection to this request.

Therefore, Mr. Smith respectfully requests the Court grant this request. Thank you for your time and consideration of this matter.

Respectfully submitted,



Elizabeth K. Quinn
Assistant Federal Defender

cc: Jeffrey Coffman, AUSA
Andrew Abbot, PTO